

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

BEEQB, LLC, a Florida Corporation, )  
Plaintiff, )  
vs. )  
BLOCKQUARRY CORP., f/k/a ISW )  
HOLDINGS, INC., a Nevada Corporation, )  
And PANTEHON RESOURCES, INC., )  
Defendant. )

**MOTION TO DISMISS  
COUNTERCLAIM OF DEFENDANT  
BLOCKQUARRY, CORP.**

Plaintiff Beeqb, LLC, by and through its undersigned counsel, moves to dismiss the counterclaim of Defendant Blockquarry, Corp., f/k/a ISW Holdings, Inc. pursuant to Fed. R. Civ. P. 12(b)(6). Plaintiff asserts that the Defendant's counterclaim fails to state a claim for which relief can be granted. Plaintiff supports its claim through the memorandum of law attached to this motion.

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*Pro Hac Vice Motions forthcoming*

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